

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Tyrone Green
Plaintiff

V.

Martin Horn, Et Al.

- CA. No. 03-149 Erie
- District Judge Mclaughlin
- Magistrate Judge Baxter
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REQUEST FOR DISCOVERY

And now comes plaintiff, Tyrone Green, Pro se and file this request for discovery.

I, humbly request the following discovery from the Attorney of defendant John Doe, security Captain of S.C.I Albion.

- 1) All medical records from Millcreek Hospital.
- 2) Access to health care manual, section 06- access to emergency care. Bureau of health care services policy #13.02.01
- 3) Facility security manual, section 22 security transport of inmates. Policy 06,03,01
- 4) Copies of all X-rays of plaintiff's hand.
- 5) Copies of all records S.C.I Albion security has concern the transport of plaintiff as while the reason the record may have concerning the security concern that prevented plaintiff from being transported to his schedule outside appointment on or about 9/5/01, 9/26/01
- 6) Records from Millcreek Hospital of all patients that it received from S.C.I Albion with fractures or broken bone from 8/25/01 thru 1/23/04
- 7) Copies of all grievance plaintiff filed while confined at S.C.I Albion.

CERTIFICATE OF SERVICE

I, hereby certify that a true and correct copy of the foregoing request for Discovery, Amended complaint adding new defendants and Damages was sent on this date 9-19-05

Via Institutional mail to;
Scott Bradley, Esquire
6th. Floor, Manor Complex
564 Forbes Ave.
Pittsburgh, Pa. 15219

Elizabeth M. Yanelli, Esquire
The Thirty Eighth Floor
One Oxford Centre
Pittsburgh, Pa. 15219

(S) *Tyronne Green*